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6

7 Attorney for William C. Thompson

8 **UNITED STATES DISTRICT COURT**  
9 **DISTRICT OF NEVADA**

10 UNITED STATES OF AMERICA,  
11 Plaintiff,  
12 v.  
13 WILLIAM C. THOMPSON  
14 Defendant.

Case No. 2:13-cr-368-JAD-NJK

**MOTION TO CONTINUE MOTION  
DEADLINES**

15  
16 COMES NOW defendant, William C. Thompson, by and through his attorney, Heidi A.  
17 Ojeda, Assistant Federal Public Defender, and hereby submits this Motion to Continue Motion  
18 Deadlines. It is requested that the defendant shall have to and including December 9, 2016 to file  
19 any and all pretrial motions and notices of defense, that the Government shall have to and including  
20 December 23, 2016 to file any and all responsive pleadings and that the defendant shall have to  
21 and including December 30, 2016 to file any and all replies to dispositive motions.

22 The undersigned counsel posits that good cause exists to continue the motion deadlines  
23 based upon the following:

- 24 1. The client is in custody and does not oppose the continuance.  
25 2. Undersigned counsel for Mr. Thompson was just recently assigned to this case at  
26 the end of September. CR# 87 Notice of Appearance. Prior counsel, Ms. Weksler, is no longer  
27 involved in this case. Further, co-defendant, David Yoder, just recently made his appearance in

1 this case on September 1, 2016. CR# 75, Minutes of Proceedings. The other co-defendant has yet  
2 to make his initial appearance in this case and is currently serving an out of state sentence in  
3 California.

4 3. Mr. Thompson is facing a severe sentence (Count 1 alone carries a mandatory  
5 minimum sentence of 20 years). Trial in this matter is currently set for April 11, 2017. CR# 77. A  
6 brief, 30-day extension of the pre-trial motion deadlines will not affect the currently scheduled  
7 trial date. Counsel for David Yoder has no objection to the extension of the pre-trial motion  
8 deadlines. The Government, however, has indicated that they oppose any additional extension. For  
9 all these reasons, Mr. Thompson requests the Court extend the pre-trial motion deadlines in this  
10 case for an additional 30 days.

11 4. Denial of this request for continuance would deny counsel for the defense sufficient  
12 time to effectively and thoroughly prepare and submit appropriate pretrial motions and notices of  
13 defense, taking into account the exercise of due diligence.

14 5. Additionally, denial of this request for continuance could result in a miscarriage of  
15 justice.

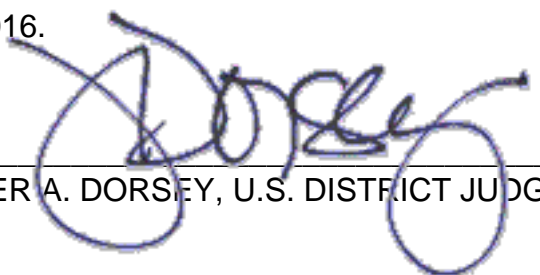
16 DATED this 9<sup>th</sup> day of November, 2016.

17 Respectfully submitted,  
18 RENE L. VALLADARES  
19 Federal Public Defender

20 By /s/ Heidi A. Ojeda  
21 HEIDI A. OJEDA  
22 Assistant Federal Public Defender  
23 Counsel for William C. Thompson

24 **IT IS SO ORDERED.**

25 DATED this 14th day of November, 2016.

26   
27 JENNIFER A. DORSEY, U.S. DISTRICT JUDGE

**CERTIFICATE OF ELECTRONIC SERVICE**

The undersigned hereby certifies that she is an employee of the Federal Public Defender for the District of Nevada and is a person of such age and discretion as to be competent to serve papers.

That on November 9, 2016, she served an electronic copy of the above and foregoing **MOTION TO CONTINUE MOTION DEADLINES** by electronic service (ECF) to the person named below:

DANIEL BOGDEN  
United States Attorney  
LISA CARTIER-GIROUX  
501 S. Las Vegas Blvd. Ste. 1100  
Las Vegas, NV 89101

/s/ Lauren Pullen  
Employee of the Federal Public Defender